



Cowan, Liebowitz & Latman, P.C.
114 West 47th Street
New York, NY 10036

(212) 790-9200 Tel
(212) 575-0671 Fax
www.cll.com

Jaime A. Berman
(212) 790-9293
jab@cll.com


November 20, 2024

Via ECF

Hon. Judge Arun Subramanian
United States District Court
Southern District of New York
500 Pearl Street, Room 15A
New York, New York 10007

GRANTED. The Clerk of Court is respectfully directed to terminate the motion at Dkt. 277.

SO ORDERED.


Arun Subramanian, U.S.D.J.
Date: February 6, 2025

Re: *Makina ve Kimya Endustrisi A.S. v. A.S.A.P. Logistics Ltd. et al.*, 1:22-cv-03933 (S.D.N.Y.)
Letter Motion to File Under Seal

Dear Judge Subramanian,

Defendants A.S.A.P. Logistics Ltd., ASAP Lojistik Ve Savunma Ticaret Limited Sirketi, ASAP Logistics and Defense Security Services Ltd. and Debbie Cross (collectively, the “ASAP Defendants”), based upon this letter motion, respectfully move the Court to allow the ASAP Defendants to file under seal, and publicly in redacted form, the ASAP Defendants’ Memorandum of Law in Opposition to Plaintiff’s Motion for Attorneys’ Fees.

This brief contains two passages discussing material designated as Confidential by Plaintiff Makina Ve Kimya Endustrisi A.S. (“Plaintiff”) under the Protective Order jointly filed by the parties in this action (Dkt. No. 143) and entered by the Court on December 15, 2022. The ASAP Defendants have highlighted in yellow in the sealed filing those portions that discuss materials that have been designated Confidential, and they have filed a public version of the brief in which the Confidential references are redacted.

The ASAP Defendants met and conferred with Plaintiff pursuant to Rule 11.C.i of the Court’s Individual Practices to narrow the scope of material designated as Confidential, and now file this letter-motion pursuant to Rule 11.C.ii and 11.C.iii. Pursuant to Rule 11.C.i., we have notified Plaintiff’s counsel that it must file, within three business days, a letter explaining the need to seal or redact the materials Plaintiff has designated as Confidential that are referenced in the foregoing filings.

Accordingly, the ASAP Defendants request that the Court allow the foregoing document to be filed under seal and redaction.

Respectfully submitted,

/s/ Jaime A. Berman
Jaime A. Berman (jab@cll.com)
Richard S. Mandel (rsm@cll.com)

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Attorneys for the ASAP Defendants